

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WOLF HALDENSTEIN ADLER FREEMAN &  
HERZ LLP; KAPLAN FOX & KILSHEIMER LLP;  
PRETI FLAHERTY BELIVEAU & PACHIOS  
LLP; and BRAMLETT LAW OFFICES,

Plaintiff,

-against-

GLASSMAN, EDWARDS, WADE & WYATT,  
P.C. and AUDET & PARTNERS LLP,

Defendants.

Case No. 08-cv-5751 (JGK)

**ECF CASE**

**NOTICE OF MOTION FOR REMAND**

**TO:** Defense Counsel

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support and the accompanying Declaration of Paul Kent Bramlett together with its exhibits, pursuant to 28 U.S.C. § 1447(c), Plaintiffs Wolf Haldenstein Adler Freeman & Herz LLP, Kaplan Fox Kilsheimer LLP; Preti Flaherty Beliveau & Pachios LLP, and Bramlett Law Offices shall move this Court for an order remanding this action to the Supreme Court of the State of New York, or such other and further relief as the Court shall deem just and proper, before the Honorable John G. Koeltl, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Room 1030, New York, NY 10007 at 9:00 a.m. on August 4, 2008, or such other time as the Court shall set.

**Dated:** July 10, 2008

Respectfully Submitted:

WOLF HALDENSTEIN ADLER FREEMAN  
& HERZ LLP

By: /s/ Thomas H. Burt  
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PRETI, FLAHERTY, BELIVEAU & PACHIOS, LLP

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